

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG
(Member Case)

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
COUNTERCLAIMS**

VirtaMove Corp. (“Plaintiff”) respectfully moves the Court for a two-week extension of time for Plaintiff to answer Defendant’s counterclaims (Dkt. 115). Plaintiff’s deadline to answer Defendant’s counterclaims is currently due on April 7, 2025, and, with this two-week extension, the deadline would be April 21, 2025. This motion is not being brought for the purpose of delay. This extension is necessary to ensure adequate time for Plaintiff to prepare its answer to Defendant’s counterclaims in view of counsels’ other commitments.

Counsel for the parties have conferred and all parties agree to this extension. Accordingly, Plaintiff requests that the Court grant the motion and enter the attached proposed Order

Dated: April 7, 2025

Respectfully submitted,

/s/ Daniel B. Kolko

Reza Mirzaie
CA State Bar No. 246953
Marc A. Fenster
CA State Bar No. 181067
Neil A. Rubin
CA State Bar No. 250761
Jacob R. Buczko
CA State Bar No. 269408
James S. Tsuei
CA State Bar No. 285530
James A. Milkey
CA State Bar No. 281283
Christian W. Conkle
CA State Bar No. 306374
Jonathan Ma
CA State Bar No. 312773
Daniel Kolko
CA State Bar No. 341680
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
Telephone: 310-826-7474
Email: rmirzaie@raklaw.com
Email: mfenster@raklaw.com
Email: nrubin@raklaw.com
Email: jbuczko@raklaw.com
Email: jtsuei@raklaw.com
Email: jmilkey@raklaw.com
Email: cconkle@raklaw.com
Email: jma@raklaw.com
Email: dkolko@raklaw.com

Qi (Peter) Tong
TX State Bar No. 24119042
8080 N. Central Expy, Suite 1503
Dallas, TX 75206
Email: ptong@raklaw.com

**ATTORNEYS FOR PLAINTIFF
VIRTAMOVE, CORP.**

CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendants on April 7, 2025 via CM/ECF.

/s/ *Daniel B. Kolko*

CERTIFICATE OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is an unopposed motion.

/s/ *Daniel B. Kolko*